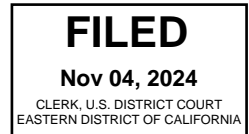


UNITED STATES DISTRICT COURT

for the  
Eastern District of California



United States of America  
v.

ERIC TREJO,

Defendants

Case No. 2:24-MJ-0134 CSK

REDACTED

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 14, 2023 in the county of San Joaquin in the ,  
Eastern District of California the defendant(s) violated:

*Code Section*  
21 U.S.C. § 841(a)(1)

*Offense Description*  
Distribution of Controlled Substances (Cocaine)

This criminal complaint is based on these facts:

(see attached affidavit)

☒ Continued on the attached sheet.

/s/

*Complainant's signature*

Matthew Allen, DEA Task Force Officer

*Printed name and title*

Sworn to me and signed via telephone.

Date: November 1, 2024

City and state: Sacramento, California

*Judge's signature*

Chi Soo Kim, U.S. Magistrate Judge

*Printed name and title*

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT &  
ARREST WARRANTS**

I, Drug Enforcement Administration Task Force Officer Matthew Allen, being duly sworn, hereby state:

1. This Affidavit is submitted in support of a Criminal Complaint charging the following people with the following crimes:
  - a. Eric TREJO for violation of 21 U.S.C. § 841(a)(1) Distribution of Controlled Substances.
2. I am a duly sworn Task Force Officer (TFO) with the United States Department of Justice, Drug Enforcement Administration (DEA). I am a “federal law enforcement officer” within the meaning of Title 18, United States Code, section 2510(7), and am authorized pursuant to Federal Rule of Criminal Procedure 41(a)(2)(C) to request a search warrant. I have been a sworn peace officer with San Joaquin County Sheriff’s Office since 2017, where I am assigned to the San Joaquin County Metropolitan Narcotics Taskforce (METRO). I have been a TFO with the DEA since March 2021. Since February 2020, I have been assigned to the DEA’s Stockton Resident Office in Stockton, California.
3. Upon being duly sworn as a TFO with the DEA, I was trained at the DEA Academy in Quantico, Virginia. During my time as a TFO with DEA, I have investigated violations of both federal and state laws pertaining to drug trafficking. I have been the case agent and assisted other agents and officers in investigating cases involving violations of Section 841(a)(1) of the Controlled Substances Act. As a sworn peace officer, I have investigated no less than 300 cases involving the possession or sale of controlled substances. Throughout my law enforcement career, I have become familiar with, and have participated in, conventional investigative methods, including, but not limited to, electronic surveillance, visual surveillance, questioning of witnesses, search warrants, confidential informants, pen registers, and trap and trace, and vehicle tracker device installation and surveillance.
4. Through my training, experience, and interaction with other experienced special agents, task force agents and officers, and other drug investigators, I have become familiar with methods, tools, and trends employed by drug traffickers to manufacture, smuggle, safeguard, store, transport, and distribute drugs, and to communicate with other participants to accomplish such objectives. These methods include the use of telephones, pre-paid or debit calling cards, public telephones, wireless communications technology such as paging devices and cellular telephones, counter-surveillance, elaborately planned smuggling schemes tied to legitimate businesses, and use of codes in communications to avoid detection by law enforcement. I have become familiar with the types and amounts of profits made by drug dealers, the terminology used, and the methods

drug traffickers use to conceal, transport, and launder cash and other types of drug proceeds. I have received training in various means by which persons involved in these types of criminal activities use telephones, computers, buildings, storage units, residences, vehicles, businesses, and other structures to conceal their activities from law enforcement.

5. Based on my training and experience, I am familiar with the modus operandi as it pertains to the unlawful possession and distribution of controlled substances in violation of state and federal law. These methods include the use of telephones, cellular telephones, wireless communication technology, counter surveillance, elaborately planned smuggling schemes tied to legitimate businesses, false or fictitious identities, and the use of coded or vague communications in an attempt to thwart law enforcement. I have also interviewed confidential sources and discussed with them the lifestyle, appearances, habits, and methods of drug dealers and users.
6. Based on my training and experience, I know that drug traffickers use their vehicles to store and transport narcotics and other contraband, often by concealing the controlled substances in hidden compartments of their vehicles. Drug traffickers also store firearms in their vehicles to protect their drug proceeds. Drug traffickers also use their vehicles to purchase supplies of drug, distribute drugs to customers, and collect money from their customers. For example, drug traffickers use their vehicles to drive to neutral meeting locations to meet with suppliers or customers, where drugs are exchanged for money (often inside of the drug dealer or customer's vehicle). Thus, evidence of drug distribution can often be found in a trafficker's vehicle.
7. In addition to my personal knowledge, this affidavit is based on (1) information I obtained from related investigations; (2) conversations with other law enforcement officers including oral and written investigative and laboratory reports that I received directly or indirectly from other law enforcement officials; (3) review and analysis of information received from various sources, including evidence provided pursuant to subpoenas and search warrants, such as GPS tracking data; (4) physical surveillance conducted by law enforcement officials reported to me either directly or indirectly; (5) a review of public records, telephone toll records, and subscriber information; (6) information provided from confidential sources of information and other sources of information working with law enforcement agencies; (7) a review of driver's license and automobile registration records; (8) records from various law enforcement databases, including but not limited to the National Law Enforcement Telecommunications System ("NLETS") and the National Crime Information Center ("NCIC"); (9) my training and experience as a DEA Task Force Officer and/or; (10) the training and experience of other law enforcement officials with whom I consulted during this investigation and the preparation of this Affidavit.

## PROBABLE CAUSE

### Target Overview

8. Based on the facts summarized below, I believe TREJO distributed controlled substances, to wit, cocaine.
  - a. Between March 2023 and July 2024, TREJO and Victoria RILEY distributed controlled substances and/or firearms to [REDACTED] on fourteen occasions.<sup>1</sup> In total, they sold approximately 1.5 pounds of cocaine hydrochloride and fourteen firearms, including two fully automatic firearms, to [REDACTED].
  - b. TREJO and RILEY currently reside in the Northern District of California where they store drugs and firearms that they distribute. They own and operate a marijuana-related business in the Northern District of California where they store drugs that they distribute. **TREJO, RILEY** and unknown individuals utilize a location in the Northern District of California to store firearms, including fully automatic firearms, which they distribute. Prior to moving to the Northern District of California, TREJO and RILEY lived in Tracy, California, located in the Eastern District of California. This is where they sold controlled substances and/or firearms to [REDACTED].

### Drug Trafficking Overview

#### ON MARCH 14, 2023, TREJO DISTRIBUTED OUNCE COCAINE

9. On March 14, 2023, DEA and METRO conducted a controlled purchase from TREJO utilizing [REDACTED]. On the same day, agents provided [REDACTED] \$800.00 in DEA Official Advanced Funds ("OAF") to purchase one ounce of cocaine from TREJO. At the direction of law enforcement, [REDACTED] called TREJO via and ordered one ounce of cocaine for \$800.00. TREJO agreed to the deal and agreed to meet [REDACTED] in the parking lot at 3296 West Grant Line Road, Tracy, CA (Safeway parking lot), located in the Eastern District of California, to conduct the transaction.
10. On the same date, Agents established surveillance on the meet location and observed a gray 2021 Toyota Rav4 License # 8XRP623<sup>2</sup> parked in the parking lot occupied by a Hispanic male.

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<sup>1</sup> [REDACTED]

<sup>2</sup> Gray 2021 Toyota Rav4; registered owner: Eric Trejo; address: 2519 Lemon Avenue, Patterson, CA.



11. Investigators observed [REDACTED] arrive at the meet location, walk over to the gray 2021 Toyota Rav4 and make contact with the male, who was later positively identified by California DMV Driver's License photograph as TREJO. [REDACTED] provided TREJO \$800.00 in DEA OAF in exchange for one ounce of cocaine.
12. Following the deal, [REDACTED] drove to a predetermined meet location where, upon arrival, [REDACTED] showed agents a clear plastic baggie containing a white powdery substance consistent with one ounce of cocaine. The suspected cocaine was subsequently sent to the DEA regional laboratory for analysis and found to contain cocaine hydrochloride (net weight 27.8 grams).
13. Agents subsequently located the California DMV Driver's License photograph of the registered owner of the gray 2021 Toyota Rav4 License # 8XRP623, Eric TREJO, and agents and [REDACTED] were able to positively identify TREJO as the source of supply for the cocaine.

**ON MARCH 21, 2023, TREJO DISTRIBUTED ONE OUNCE OF COCAINE**

14. On March 21, 2023, DEA and METRO conducted a controlled purchase from TREJO utilizing [REDACTED]. On the same day, agents provided [REDACTED] \$800.00 in DEA OAF to purchase one ounce of cocaine from TREJO. At the direction of law enforcement, [REDACTED] called TREJO and ordered one ounce of cocaine. TREJO agreed to meet [REDACTED] in the parking lot at 3296 West Grant Line Road, Tracy, CA (business parking lot), located in the Eastern District of California, to conduct the transaction.
15. Agents observed TREJO driving through the parking lot of the meet location in the gray 2021 Toyota Rav4 and park next to [REDACTED]'s vehicle. Agents then observed [REDACTED] enter the front passenger's seat of TREJO's vehicle where [REDACTED] provided TREJO \$800.00 in DEA OAF in exchange for one ounce of cocaine.
16. Following the deal, [REDACTED] drove to a predetermined meet location where, upon arrival, [REDACTED] showed agents a clear plastic baggie containing a white powdery substance consistent with one ounce of cocaine. The suspected cocaine was subsequently sent to the DEA regional laboratory for analysis and found to contain cocaine hydrochloride (net weight 28.1 grams).
17. Investigators had continued to follow TREJO and observed him park at the Bank of America in the same parking lot of the meet location and walk up to the ATM and deposit money.

**ON APRIL 13, 2023, TREJO DISTRIBUTED 24 GRAMS OF COCAINE**

18. On April 13, 2023, DEA and METRO conducted a controlled purchase from TREJO utilizing [REDACTED]. On the same day, agents met with [REDACTED] and provided CS-1 \$800.00 in DEA OAF to purchase one ounce of cocaine from TREJO. At the direction of law enforcement, [REDACTED] called TREJO and ordered one ounce of cocaine. TREJO advised he had just under one ounce of cocaine for sale and agreed to meet [REDACTED] in the parking lot at 19555 Mountain House Parkway, Tracy, CA (Safeway), located in the Eastern District of California, to conduct the

transaction.

19. Agents established surveillance on the meet location and observed TREJO pull into the Safeway parking lot and park. Investigators observed [REDACTED] park next to TREJO's vehicle and enter the front passenger's seat of TREJO's vehicle where [REDACTED] provided TREJO \$800.00 in DEA OAF in exchange for approximately 24 grams of cocaine. Through the wire, agents could hear a conversation between [REDACTED] and TREJO regarding cocaine and money.
20. Following the deal, [REDACTED] drove to a predetermined meet location where, upon arrival, [REDACTED] showed agents a white paper bag that contained a clear plastic baggie containing a white powdery substance consistent with one ounce of cocaine. The suspected cocaine was subsequently sent to the DEA regional laboratory for analysis and found to contain cocaine hydrochloride (net weight 28.1 grams).

#### **ON MAY 1, 2023, TREJO DISTRIBUTED FOUR OUNCES OF COCAINE**

21. On May 1, 2023, DEA and METRO conducted a controlled purchase from TREJO utilizing [REDACTED]. On the same day, agents met with [REDACTED] and provided [REDACTED] \$3,000.00 in OAF to purchase four ounces of cocaine from TREJO. At the direction of law enforcement, [REDACTED] called TREJO via phone and ordered four ounces of cocaine. TREJO agreed to the deal and provided [REDACTED] a meet location of 19555 Mountain House Parkway, Tracy, CA (Safeway), located in the Eastern District of California to conduct the transaction.
22. Agents established surveillance on TREJO and observed him arrive at the meet location and park next to [REDACTED]'s vehicle. Investigators observed [REDACTED] enter the front passenger seat of TREJO's vehicle where [REDACTED] provided TREJO \$3,000.00 in DEA OAF in exchange for four ounces of cocaine. Agents observed [REDACTED] exit TREJO's vehicle carrying a white bag and return to [REDACTED]'s vehicle. TREJO drove away from the meet location with surveillance units following.
23. Following the deal, [REDACTED] drove to a predetermined meet location where, upon arrival, [REDACTED] showed agents a white paper bag that contained a clear plastic baggie containing a white powdery substance consistent with four ounces of cocaine. The suspected cocaine was subsequently sent to the DEA regional laboratory for analysis; however, at the time of this writing lab analysis reports have not been received from the laboratory.

#### **ON MAY 18, 2023, TREJO DISTRIBUTED TWO FIREARMS**

24. On May 18, 2023, ATF, DEA, and METRO conducted a controlled purchase from TREJO utilizing [REDACTED]. On the same day, agents met with [REDACTED] and provided [REDACTED] \$3,800.00 in ATF OAF to purchase firearms from TREJO. At the direction of law enforcement, [REDACTED] called TREJO and ordered two firearms. TREJO agreed to the deal and provided [REDACTED] a meet location of 19555 Mountain House Parkway, Tracy, CA (Safeway), located in the Eastern District of California to conduct the transaction.

25. On the same date, investigators established surveillance on 7 Piazza Street, Tracy, CA, the residence of TREJO. Agents observed TREJO arrive and park in front of 7 West Piazza Street, Tracy, CA in the gray Toyota Highlander License # 8YOR120 and enter the garage.
26. Agents observed TREJO exit the garage of the residence carrying a weighted black duffle bag and place it into the passenger's compartment of the vehicle. TREJO then entered the driver's seat of the vehicle and drove away from the location with surveillance units following.
27. Investigators followed TREJO as he drove directly to the meet location. Upon TREJO's arrival, investigators observed [REDACTED] walked over to the gray 2021 Toyota Highlander and open the front passenger's door. Through the wire, Agents could hear a conversation between [REDACTED] and TREJO regarding guns. [REDACTED] provided TREJO \$3,800.00 in ATF OAF and removed the black duffle bag from TREJO's vehicle and place it into [REDACTED]'s vehicle.
28. Following the deal, [REDACTED] departed the meet location and drove to a predetermined meet location where, upon arrival, [REDACTED] showed agents a black duffle bag that contained an AR15 style pistol with a 30-round magazine and a Sig Sauer MPX 9mm with a loaded magazine. Investigators conducted a search of [REDACTED] and [REDACTED]'s vehicle for additional contraband with negative results. The firearms. were subsequently turned over to ATF for processing and safekeeping.

**ON MAY 22, 2023, TREJO DISTRIBUTED A .50 CALIBER SEMI-AUTOMATIC RIFLE**

29. On May 22, 2023, ATF, DEA, and METRO conducted a controlled purchase from TREJO utilizing [REDACTED]. On the same day, agents met with [REDACTED] and provided [REDACTED] \$2,500.00 in ATF OAF to purchase a .50 caliber semi-automatic rifle and ammunition from TREJO. At the direction of law enforcement, [REDACTED] called TREJO and ordered a .50 caliber rifle. TREJO agreed to the deal and provided [REDACTED] a meet location of 19555 Mountain House Parkway, Tracy, located in the Eastern District of California, to conduct the transaction.
30. On the same date, Agents established surveillance on TREJO's residence. and observed TREJO exit his residence carrying a large weighted down trash bag and place it into vehicle, which he drove directly to the meet location. Agents observed TREJO park next to [REDACTED]'s vehicle. Investigators observed [REDACTED] enter the front passenger's seat of TREJO's vehicle where [REDACTED] provided TREJO \$2,500.00 in ATF OAF. Agents then observed [REDACTED] remove a weighted black plastic trash bag from TREJO's vehicle and place it into [REDACTED]'s vehicle.
31. Following the deal, [REDACTED] departed the meet location and drove to a predetermined meet location where, upon arrival, [REDACTED] showed agents a black plastic trash bag which contained a .50 caliber rifle and .50 caliber ammunition. Investigators conducted a search of [REDACTED]'s vehicle for additional contraband with negative results. The firearms. were subsequently turned over to ATF for processing and safekeeping.



**ON JUNE 1, 2023, TREJO DISTRIBUTED TWO ASSAULT RIFLES AND A PISTOL**

32. On June 1, 2023, ATF, DEA, and METRO conducted a controlled purchase from TREJO utilizing [REDACTED]. On the same day, agents met with [REDACTED] and provided [REDACTED] \$4,500.00 in ATF OAF to purchase two assault rifles and a Glock pistol from TREJO. At the direction of law enforcement, [REDACTED] called TREJO and ordered three firearms. TREJO agreed to the deal and provided [REDACTED] a meet location of the In-Shape Gym at 101 South Tracy Boulevard, Tracy, CA, located in the Eastern District of California to conduct the transaction.
33. Agents had established surveillance on TREJO's residence and observed TREJO exit the garage carrying a large white and blue cardboard box that was weighted. TREJO placed the box into the trunk the vehicle. Agents observed TREJO and Victoria RILEY exit the residence and enter the vehicle and drive away from the location. Investigators followed TREJO and RILEY as they drove directly to the meet location and park next to [REDACTED]. Investigators observed [REDACTED] make contact with TREJO and RILEY at the driver's window. Agents then observed TREJO exit the vehicle and remove the white and blue box from the vehicle and place it in the back of [REDACTED] provided TREJO \$4,500.00 in ATF OAF.
34. Following the deal, [REDACTED] drove to a predetermined meet location where, upon arrival, [REDACTED] showed agents a large white and blue box that contained an AR15 style semi-automatic rifle, an AK47-style rifle and a Glock semi-automatic pistol. The firearms were subsequently turned over to ATF for processing and safekeeping.

**ON JUNE 26, 2023, TREJO DISTRIBUTED TWO OUNCES OF COCAINE AND FIVE SEMI-AUTOMATIC PISTOLS**

35. On June 26, 2023, ATF, DEA, and METRO conducted a controlled purchase from TREJO utilizing [REDACTED]. On the same day, agents met with [REDACTED] and provided [REDACTED] \$7,800.00 in ATF/DEA/METRO OAF to purchase firearms and two ounces of cocaine from TREJO. At the direction of law enforcement, [REDACTED] called TREJO and ordered two ounces of cocaine and five firearms. TREJO agreed to the deal and provided [REDACTED] a meet location of 1780 Whirlaway Lane, Tracy, CA, which was a park in a residential area located in the Eastern District of California, to conduct the transaction. Based on GPS tracking devices installed on TREJO's 2021 Toyota Rav4 license # 8XRP623 and 2021 Toyota Highlander License #8YOR120 agents had determined that TREJO and RILEY had moved from 7 West Piazza Street, Tracy, CA to 2553 Gregson Avenue Tracy, CA, located in the Eastern District of California.
36. On the same date, investigators established surveillance on 2553 Gregson Avenue and observed TREJO exit 2553 Gregson Avenue carrying a box and placing the box into the front passenger's seat of the vehicle and drive away from the location with investigators following. Agents observed TREJO return to 2553 Gregson Avenue exit his vehicle and retrieve a second box from the garage



which he placed in the front passenger's seat of the vehicle. Investigators observed TREJO enter the driver's seat of the vehicle and drive away from the location with investigators following.

37. Investigators followed TREJO as he drove directly to the meet location. Upon TREJO's arrival, investigators observed [REDACTED] walk up to the vehicle and provide TREJO \$7,800.00 in DEA/ATF OAF. Agents observed [REDACTED] then remove a large red bag from the vehicle and place it into [REDACTED]'s vehicle and TREJO drove away from the meet location.
38. Following the deal, [REDACTED] drove to a predetermined meet location where, upon arrival, [REDACTED] showed agents the large red bag that contained a loaded Glock Model 19X pistol, a Glock Model 19, a Glock Model 22, a loaded FN 9mm Pistol, a loaded Springfield .45 caliber pistol, an AK47-style rifle and two clear plastic baggies containing a white powdery substance. The two clear plastic baggies were consistent in size and each contained a white powdery substance consistent with suspected cocaine. The firearms were subsequently turned over to ATF for processing and safe keeping. The suspected cocaine was subsequently sent to the DEA regional laboratory for analysis and found to contain cocaine hydrochloride (net weight 55.3 grams).

**USPS SERVED A FEDERAL SEARCH WARRANT ON A PACKAGE SENT BY TREJO. AGENTS SEIZED 490 GRAMS OF SUSPECTED MARIJUANA, 25 GRAMS OF SUSPECTED MDMA AND 1640 GRAMS OF SUSPECTED CANNIBAS VAPE CARTRIDGES**

39. On June 22, 2023, I received notification from vehicle tracker '5950', which was installed on the 2021 Toyota Highlander bearing CA license plate 8YOR120, had traveled to the area of the Tracy Post Office located at 125 W. 9th Street, Tracy, CA. I received another notification vehicle tracker '5950' had driven away from the Tracy Post Office. This information was provided to US Postal Inspector Jed Tyler for the intention of identifying parcels Eric TREJO may be sending through the United States Postal Service (USPS).
40. Inspector Tyler, utilizing video surveillance footage within the Tracy Post Office, was able to identify TREJO as arriving at the Post Office within the time frame and sending a package to Wichita, KS. The package was sent from "Derek Barba, Address:(R) 133 Losata Drive Tracy, CA." The package was addressed to "Joshua Barba, Address: (R) 1418 S. Ida Street Wichita, KS."
41. Inspector Tyler facilitated the parcel interception which was returned to Stockton. On July 6, 2023, Inspector Tyler submitted a search warrant which was signed by US Magistrate Judge, the Honorable Deborah Barnes for the package.
42. On July 10, 2023, Inspector Tyler, METRO Agent Matthew Garlick, and I executed the search warrant on the package. The package was found to contain 490 grams of suspected marijuana, 1,640 grams of suspected cannabis vape

cartridges, and 25 grams of suspected MDMA. These items were seized as evidence by USPS Inspector Tyler and booked into evidence pursuant to USPS policies and procedures.

**ON AUGUST 10, 2023, TREJO DISTRIBUTED TWO OUNCES OF COCAINE AND AN ASSAULT RIFLE**

43. On August 10, 2023, ATF, DEA, and METRO conducted a controlled purchase from TREJO utilizing [REDACTED]. On the same day, agents met with [REDACTED], conducted a search of [REDACTED]'s vehicle and provided [REDACTED] \$2,800.00 in ATF/DEA/METRO OAF to purchase a firearm and two ounces of cocaine from TREJO. At the direction of law enforcement, [REDACTED] called TREJO and ordered two ounces of cocaine and a firearm. TREJO agreed to the deal and provided [REDACTED] a meet location of 2230 Criselda Mina Avenue, Tracy, CA, which was a residential area, to conduct the transaction.
44. Agents had established surveillance on 2553 Gregson Avenue and observed TREJO exit the residence, enter the driver's seat of a white 2023 GMC Yukon License # 9GZA561<sup>3</sup> and drive away from the location with investigators following. Agents observed TREJO pull up to the meet location and park next to [REDACTED]. Investigators observed [REDACTED] enter the front passenger's seat of the vehicle where [REDACTED] provided TREJO \$1,600.00 in ATF/DEA/METRO OAF in exchange for two ounces of cocaine.
45. [REDACTED] exited TREJO's and texted Agents advising that TREJO was going to send an address for [REDACTED] to go and meet the gun SOS to purchase the firearm. [REDACTED] and TREJO subsequently separated, and TREJO drove away from the location. A short time later, TREJO texted [REDACTED] to meet the gun SOS at 181 West Alameda Street, Manteca, CA (Lavish Cloud Smoke Shop), located in the Eastern District of California.
46. Agents observed [REDACTED] arrive at Lavish Cloud Smoke Shop and enter the business. Through the wire, investigators could hear a conversation between [REDACTED] and a male voice regarding a firearm.
47. Agents observed [REDACTED] exit the location carrying a rifle wrapped in a blanket and place the rifle into [REDACTED]'s vehicle. Agents then observed a Hispanic male, later identified as [REDACTED] and drive away from the location.
48. [REDACTED] departed the meet location and drove to a predetermined meet location where, upon arrival, [REDACTED] showed agents a blanket that contained a loaded AR-15-style semi-automatic rifle and a red solo cup that contained a clear plastic baggy containing a white powdery substance consistent two ounces of suspected cocaine. The firearms were subsequently turned over to ATF for processing and

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<sup>3</sup> White 2023 GMC Yukon; registered owner: Eric Trejo; address: 2519 Lemon Avenue Patterson, CA

safekeeping according to ATF policies and procedures. The suspected cocaine was subsequently sent to the DEA regional laboratory for analysis. At the time of this writing, lab analysis reports have not been received from the laboratory.

49. Following the controlled purchase, investigators located the California Driver's license photograph of [REDACTED] and positively identified him as the subject who exit the business following the controlled purchase of the rifle. [REDACTED] was shown [REDACTED] California Driver's License photograph and positively identified him as the subject who had sold [REDACTED] the rifle at Lavish Cloud Smoke Shop.

**ON OCTOBER 24, 2023, TREJO AND RILEY DISTRIBUTED 100 SUSPECTED VAPE CARTRIDGES CONTAINING CONCENTRATED THC**

50. On October 24, 2023, DEA and METRO Agents conducted a controlled purchase from TREJO utilizing [REDACTED]. On the same day, agents met with [REDACTED] and provided [REDACTED] \$1,100 in DEA/METRO OAF to purchase 100 THC Vape cartridges from TREJO. At the direction of law enforcement, [REDACTED] called TREJO and ordered 100 THC Vape cartridges. TREJO agreed to the deal and provided [REDACTED] a meet location of 34243 South Chrisman Road, Tracy, CA, which was a gas station and parking lot located in the Eastern District of California, to conduct the transaction.
51. Agents had established surveillance on 2553 Gregson Avenue and observed the vehicle arrive and pull into the driveway. Agents observed TREJO enter and then exit the residence carrying black boxes, place them into the passenger's side rear of the vehicle and drive away from the location. Agents observed RILEY in the front passenger's seat of the vehicle.
52. Agents observed TREJO and RILEY arrive at the meet location and park in front of [REDACTED] vehicle. Agents observed [REDACTED] walk over to the vehicle and provide TREJO \$1,100.00 in DEA OAF in exchange for two black boxes containing THC vape pen cartridges. TREJO and RILEY then drove away from the meet location.
53. [REDACTED] departed the meet location and drove to a predetermined meet location where, upon arrival, [REDACTED] showed agents the two black boxes that contained the THC cartridges. The THC vape cartridges were subsequently sent to the DEA regional laboratory for analysis. At the time of this writing, lab analysis has not been conducted on the THC vape cartridges; however, the THC vape cartridges are annotated "Jefa LIQUID DIAMOND INDICA DISPOSABLE" with a marijuana leaf emblem.

**ON DECEMEBER 18, 2023, TREJO DISTRIBUTED AN OUNCE COCAINE AND 90 SUSPECTED CANNIBAS VAPE CARTRIDGES**

54. On December 18, 2023, DEA and METRO conducted a controlled purchase from TREJO utilizing [REDACTED]. On the same day, agents met with [REDACTED] and provided [REDACTED] \$2,000 in DEA/METRO OAF to purchase 100 THC Vape



cartridges and one ounce of cocaine from TREJO. At the direction of law enforcement, [REDACTED] called TREJO and ordered 90 THC vape pen cartridges and one ounce of cocaine. TREJO agreed to the deal and provided [REDACTED] a meet location of 34243 South Chrisman Road, Tracy, CA, which was a gas station and parking lot, to conduct the transaction.

55. Agents observed his vehicle arrive at the meet location and park near [REDACTED] vehicle. Agents observed the driver of the vehicle was TREJO. [REDACTED] walked up to the front driver's window where [REDACTED] provided TREJO \$2,000.00 in DEA/METRO OAF in exchange for 90 THC vape pen cartridges and one ounce of cocaine.
56. Following the deal, [REDACTED] departed the meet location and drove to a predetermined meet location where, upon arrival, [REDACTED] showed agents a bag that contained the THC vape cartridges and a clear plastic baggy containing a white powdery substance consistent with one ounce of cocaine. The THC vape cartridges and cocaine were subsequently sent to the DEA regional laboratory for analysis. At the time of this writing, lab analysis has not been conducted on the THC vape cartridges. Per DEA lab analysis reports, the suspected cocaine was found to contain cocaine hydrochloride (net weight 24.9 grams).

**ON APRIL 23, 2024, SURVEILLANCE WAS CONDUCTED ON TREJO & RILEY**

57. On January 11, 2024, a search warrant pursuant to a GPS tracking device was authorized by the Honorable Deborah Barnes, United States Magistrate Judge in the Eastern District of California for TREJO's vehicle. Following the installation of the vehicle tracker, investigators learned TREJO and RILEY had moved from 2553 Gregson Avenue to 4910 Cherryvale Avenue, Soquel, CA, located in the Northern District of California. On April 23, 2024, Agents established surveillance at on the residence. Agents observed TREJO's vehicles parked in the driveway of the residence.
58. Agents observed TREJO's vehicle back out of the driveway of the residence and drive away from the location. Agents observed that TREJO was the driver and RILEY was the front passenger of the vehicle. Agents followed TREJO to the parking lot of 2720 South Rodeo Gulch Road, Soquel, CA and park in front of the warehouse. This location is known to Agents to be rented out by RILEY to store THC and Marijuana related items.
59. Agents observed RILEY exit the location through the man-door and return to the front passenger's seat of the vehicle. TREJO and RILEY then drove away from the location.
60. Agents followed TREJO to Santa Cruz Community Credit Union (2750 41<sup>st</sup> Avenue, Soquel, Suite F). Agents observed RILEY exit the vehicle and walk up and into the bank. Agents observed RILEY exit the bank and get back into the front passenger's seat of their vehicle.
61. Agents followed TREJO and RILEY as they returned to the residence.



**ON JULY 24, 2024, TREJO AND RILEY DISTRIBUTED FOUR OUNCES OF COCAINE, A MARCHING GUN, A MACHINE GUN CONVERSION SWITCH AND 100 SUSPECTED CANNIBAS VAPE CARTRIDGES**

62. On July 24, 2024, ATF, DEA, and METRO conducted a controlled buy from TREJO and RILEY for four ounces of cocaine, 100 TCH Vape Cartridges, a full auto AR15 style pistol and a GLOCK full auto conversion switch. On the same day, agents met with [REDACTED], conducted a search of [REDACTED]'s vehicle for contraband with negative results and provided [REDACTED] \$8,400.00 in ATF/DEA/METRO OAF to purchase the four ounces of cocaine, 100 TCH Vape Cartridges and a full auto AR15 style pistol from TREJO. At the direction of law enforcement, [REDACTED] called TREJO and ordered four ounces of cocaine, a machine gun, a machine gun conversion switch and 100 THC vape pen cartridges. TREJO agreed to the deal and provided [REDACTED] a meet location of 2111 Treewood Lane San Jose, CA, located in the Northern District of California.
63. Agents had established surveillance on TREJO and RILEY's residence and observed TREJO exit the residence and load items into his vehicle. Agents observed TREJO place car seats into the vehicle and observed small children enter the vehicle. Agents then observed TREJO and RILEY enter the vehicle and drive away from the location with Agents following.
64. Agents followed them as they drove to and parked in front of the Santa Cruz Community Credit Union (2750 41st Ave. Suite F, Soquel). Agents then observed RILEY exit the vehicle and enter the bank.
65. A short time later, Agents observed RILEY exit the bank and get back into the front passenger's seat of their vehicle. The vehicle then drove away from the location with surveillance units following.
66. Agents followed TREJO and RILEY as they drove to 2720 S. Rodeo Gulch Road, Soquel, CA and parked. Agents observed RILEY exit the vehicle, walk up to the warehouse, enter a code on a keypad and walk into the warehouse through a double-door located on the far left side of the south side of the building. A short time later, agents observed RILEY exit the warehouse, through the same doors, return to the front passenger's seat their vehicle and the vehicle drive away from the location with investigators following. Near that time, [REDACTED] received a text from TREJO advising that TREJO was driving to the meet location and provided a 40-minute arrival time. At the direction of investigators, [REDACTED] changed the meet location to a McDonalds (1795 Landess Avenue San Jose, CA).
67. Agents followed TREJO and RILEY as they drove directly to a residence where they backed into the driveway. Agents observed TREJO exit the vehicle and make contact with an unknown subject in front of the residence and shake hands near the open garage door. Agents observed TREJO open the rear hatch of the vehicle and place something inside the vehicle. TREJO then got back into the driver's seat and drove away from the location and the unknown male walked up to the front of the residence and out of view. As TREJO was pulling away from

the residence, [REDACTED] received a call from TREJO in which TREJO stated that had picked up the gun and Glock full-auto machine gun conversion switch and was driving to the meet location.

68. Agents followed TREJO and RILEY as they drove directly to the meet location and parked next to [REDACTED]. Investigators observed [REDACTED] walk over to the white 2023 GMC Yukon License #9GZA561 and make contact at the front driver's side window. Agents then observed TREJO exit the driver's seat, walk to the rear of the vehicle and open the hatch. Agents could also see that RILEY and two juveniles were present during the gun and drug deal inside the vehicle.
69. Agents observed TREJO and [REDACTED] remove two boxes from the trunk of TREJO's vehicle and place them into the back of [REDACTED]'s vehicle. Investigators observed [REDACTED] enter the driver's seat and TREJO enter the front passenger's seat of [REDACTED] vehicle where [REDACTED] provided TREJO \$8,400.00 in DEA/ATF/METRO OAF in exchange for four ounces of cocaine, a machine gun, a machine gun conversion switch and 100 THC vape pen cartridges. Agents then observed TREJO exit [REDACTED] vehicle, return to the driver's seat of the vehicle and drive away from the location.
70. Following the deal, [REDACTED] departed the meet location and drove to a predetermined meet location. Upon arrival, [REDACTED] showed agents the two boxes that TREJO provided [REDACTED]. Agents opened up one box and observed a white and black Cummings Inc. 5.7 assault pistol (Model MK4 Serial # B0D6135), a loaded 30 round magazine, a bag of ammunition, optics, a full auto conversation kit for the gun and also a Glock full auto switch. In the second box, Agents observed a clear plastic bag containing a white powdery substance consistent with four ounces of suspected cocaine and approximately 100 vape pen cartridges. [REDACTED] advised TREJO and RILEY's kids were leaning over the rear seat watching TREJO sell [REDACTED] the guns and drugs and RILEY was sitting in the front seat of the vehicle watching. The suspected cocaine was sent to the DEA regional laboratory for analysis and safe keeping and found to contain cocaine hydrochloride (net weight 112.0 grams. At the time of this writing, laboratory analysis has not been received regarding the THC vape pen cartridges. The firearms were turned over to ATF Agents for processing and safe keeping and were later functioned tested as operational firearms.

### **REQUESTED WARRANTS**

71. I request that based upon this Affidavit, a Criminal Complaint and Arrest Warrants be issued for the following people for the following crimes:
  - a. Eric TREJO with a violation of 21 U.S.C. § 841(a)(1) – Distribution of Controlled Substances.

**REQUEST TO SEAL**

72. I further request that the Court seal the warrant and the affidavit and application in support thereof, except that copies of the warrant in full or redacted form may be maintained by the United States Attorney's Office and may be served on Special Agents and other investigative and law enforcement officers of the DEA, federally deputized state and local law enforcement officers, and other government and contract personnel acting under the supervision of such investigative or law enforcement officers, as necessary to effectuate the warrant, and for use in investigation and prosecution. These documents pertain to and discuss an ongoing criminal investigation that is neither public nor known to all the targets of the investigation. Accordingly, there is good cause to seal these documents because their premature disclosure may seriously jeopardize the investigation. Sealing these documents will also better ensure the safety of [REDACTED] law enforcement personnel. The United States Attorney's Office is requesting that it be permitted to share these documents with defense counsel and others as necessary to comply with its discovery obligations.

I swear under penalty of perjury, that the foregoing information is true and correct to the best of my knowledge, information, and belief.

/s/

TFO Matthew Allen  
Drug Enforcement Administration

Sworn to and subscribed before me on the 1<sup>st</sup> day of November of 2024.



Hon. Chi Soo Kim  
United States Magistrate Judge

Approved as to form:



Matthew De Moura  
Special Assistant U.S. Attorney

**Penalties for Criminal Complaint**

**DEFENDANT ERIC TREJO**

**VIOLATION:** 21 U.S.C. § 841(a)(1) – Distribution of 500 grams or more of a mixture or substance containing a detectable amount of cocaine

**PENALTIES:** Mandatory minimum of 5 years’ imprisonment up to 40 years’ imprisonment; and  
Fine of up to \$5,000,000; and  
Supervised release of at least 3 years and up to life.

**SPECIAL ASSESSMENT:** \$100 (mandatory on each count)